

**THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

**WATSON GRINDING &
MANUFACTURING CO.,**

Debtor.

§§§§§

CASE NO. 20-30967

(Chapter 11)

**GILBERTO FIGUEROA AND
ISABELLA FIGUEROA,**

Plaintiffs,

V.

**WATSON GRINDING AND
MANUFACTURING CO., WATSON
VALVE SERVICES, INC., KMHJ
MANAGEMENT COMPANY, LLC,
KMHJ, LTD., WESTERN
INTERNATIONAL GAS &
CYLINDERS, INC., AND MATHESON
TRI-GAS, INC.**

Defendants.

ADVERSARY NO. 20-03090

**WESTERN INTERNATIONAL GAS & CYLINDERS, INC.
AND MATHESON TRI-GAS INC.'S STATEMENT PURSUANT TO FED. R. BANKR.
PROC. RULE 9027(e)(3) IN RESPONSE TO NOTICE OF REMOVAL**

Defendants Western International Gas & Cylinder, Inc. and Matheson Tri-Gas Inc. (collectively, “Western and Matheson”) hereby submit this statement pursuant to Fed. R. Bankr. Proc. Rule 9027(e)(3), and in response to the Notice of Removal filed by Watson Grinding and Manufacturing Co. (“Debtor”) on April 20, 2020.

Western and Matheson consent to the entry of any final order or judgment by this Court in the lawsuit entitled *Gilberto Figueroa and Isabella Figueroa v. Watson Grinding and Manufacturing, Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, Ltd., Western International Gas & Cylinders, Inc. and Matheson Tri-Gas, Inc.*; Cause No. 2020-08062, filed in the 61st Judicial District Court of Harris County, Texas.

DATED this 4th day of May, 2020.

Respectfully submitted,

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**COUNSEL FOR MATHESON TRI-GAS, INC.
AND WESTERN INTERNATIONAL GAS &
CYLINDERS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 4, 2020, I caused a copy of the foregoing to be served on the parties listed below through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas or by First Class U.S. Mail, postage prepaid.

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